

EXHIBIT 7

UNCERTIFIED ROUGH DRAFT SARA TINDALL GHAZAL 1105214

1 Deposition of witness name
date

2

3 (Reporter disclosure made pursuant to

4 Article 8.B of the Rules and Regulations of the
5 Board of Court Reporting of the Judicial
6 Council of Georgia.)

7 VIDEOGRAPHER: We are on the record. The
8 time is 10:13 a.m. on November 5, 2021, and
9 this is the beginning of the video deposition
10 for Sara Ghazal.

11 Would counsel please identify themselves
12 and who they represent for the record.

13 MS. ELSON: Good morning. This is Hannah
14 Elson. I'm here representing Curling
15 plaintiffs from Morrison & Foerster. I also
16 have Veronica Ascarrunz and Reema Shocair from
17 Morrison & Foerster as well.

18 MR. RUSSO: Good morning. This is Vincent
19 Russo with the law firm Robbins Ross Alloy
20 Belinfante Littlefield. I have with me Carey
21 Miller from our firm. We represent Ms. Ghazal
22 and the state departments in this case.

23 MS. ROWAN: Nancy Rowan from the Fulton
24 County office of the attorneys office. I
25 represent Fulton County Voter registration and

1 UNCERTIFIED ROUGH DRAFT SARA TINDALL GHAZAL 11052133
1 BY MS. ELSON:

2 Q. To your understanding of audits, the --

3 within a single vote -- let me rephrase.

4 So you stated that audits select a

5 statistically significant sample of ballots to

6 review.

7 Do those audits ever compare within a

8 single ballot that the human readable text matches

9 what is reflected in the QR code?

10 MR. RUSSO: Objection to form.

11 THE WITNESS: Not to the best of my

12 knowledge.

13 BY MS. ELSON:

14 Q. So do audits in Georgia verify whether any

15 one individual's vote was counted accurately?

16 MR. RUSSO: Objection to form.

17 THE WITNESS: Audits verify whether the

18 right person won.

19 BY MS. ELSON:

20 Q. So the answer to the question of whether

21 they verify that any specific vote was counted

22 correctly would be no? Am I misunderstanding?

23 A. No. That -- that is my understanding as

24 well.

25 Q. If a QR code was changed from what the

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1 11:20.

2 (Off the record.)

3 VIDEOGRAPHER: We're back on the record at

4 11:33.

5 BY MS. ELSON:

6 Q. Okay. Ms. Ghazal, in the process of

7 preparing -- or in the process of this litigation,

8 did you collect any documents?

9 A. Personally?

10 Q. To produce in the -- in this case?

11 A. Sure. I -- I reviewed my email inbox

12 because I have only been on the board for a few

13 months, so I can review my by line.

14 Q. Okay. Did you look anywhere else besides

15 your email?

16 A. I did not.

17 Q. All right. Are you aware that an expert

18 in case named Alex Halderman has examined Georgia's

19 voting equipment and issued a report about it?

20 A. Yes.

21 Q. And what do you know about that report?

22 A. I know the report has been sealed and

23 shared only with the attorneys.

24 Q. Have you read about Dr. Halderman's public

25 reply or his declarations?

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1 A. I have seen news reports related to it.

2 Q. And what do those news reports discuss?

3 A. That one in particular suggested that he
4 was -- that Dr. Halderman was seeking to share the
5 results of his -- his studies with other parties.

6 Q. Are you aware that he found that Georgia's
7 election system can be hacked in numerous ways?

8 MR. RUSSO: Objection to form.

9 THE WITNESS: That is my understanding
10 based on the reporting, yes.

11 BY MS. ELSON:

12 Q. And are you aware that at least -- he
13 found that at least one of those hacks can be
14 implemented by a voter in the voting booth in just a
15 couple of minutes?

16 MR. RUSSO: Objection to form.

17 THE WITNESS: I haven't read the report,
18 so I am not aware of that level of detail.

19 BY MS. ELSON:

20 Q. Does hearing that concern you?

21 A. I would have to have much more context.

22 Q. Has the state election board taken any
23 action to retrieve that context?

24 MR. RUSSO: Objection to form.

25 THE WITNESS: To the best of my knowledge,

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1 no.

2 BY MS. ELSION:

3 Q. And why have -- why haven't they?

4 MR. RUSSO: Objection to form.

5 It's unclear what we're talking about

6 here. Why haven't they done -- done what and

7 what is the context?

8 BY MS. ELSION:

9 Q. Do you understand the question, Ms. Ghazal

10 or could you want me to repeat or rephrase?

11 A. Could you rephrase, please.

12 Q. Sure. Why hasn't the state election board

13 taken any action to determine the vulnerabilities

14 that Dr. Halderman found in his report?

15 MR. RUSSO: Object to form.

16 THE WITNESS: I can't speculate what other

17 members are thinking or doing. We -- we are

18 four individuals with one unfilled position.

19 So I don't -- I don't know what they're

20 thinking.

21 BY MS. ELSION:

22 Q. Do you want to know more information about

23 what Dr. Halderman found?

24 A. I am not a technical expert. I don't know

25 how much I would understand, frankly, of what

1 UNCERTIFIED ROUGH DRAFT SARA TINDALL GHAZAL 11052152
1 Dr. Halderman found. I believe a high-level
2 understanding would be helpful.

3 Q. And are you aware that we've asked the
4 secretary of state's offices attorneys to provide a
5 proposal to allow the secretary of state and the
6 state election board access to some or all of the
7 sealed report?

8 MR. RUSSO: Objection to form.

9 THE WITNESS: I was aware that there was
10 some discussion. I didn't -- I'm not aware of
11 the -- the extent of what is -- what has been
12 discussed.

13 BY MS. ELSON:

14 Q. To follow-up on something you mentioned,
15 would you like to receive high-level information
16 about what Dr. Halderman found in terms of
17 vulnerabilities of the Georgia election system?

18 A. Yes.

19 Q. Are you aware that the office of the
20 secretary of state have hired their own experts in
21 this litigation?

22 A. That would be my assumption for any
23 litigation.

24 Q. And are you aware that the secretary of
25 state's election security expert testified under

1 UNCERTIFIED ROUGH DRAFT SARA TINDALL GHAZAL 11052153
1 oath that he doesn't dispute Dr. Halderman's

2 findings about the Georgia election equipment?

3 MR. RUSSO: Objection to form. It lacks
4 foundation.

5 THE WITNESS: I have no direct knowledge
6 of what the secretary of state's expert has
7 testified to.

8 BY MS. ELSON:

9 Q. What has the secretary of state's
10 office -- let me start over.

11 What has the state election board done to
12 remedy the vulnerabilities discovered by
13 Dr. Halderman in Georgia's election system?

14 MR. RUSSO: Object to the form. She just
15 testified that she hasn't seen his report.

16 THE WITNESS: I don't know what the
17 vulnerabilities may be, so yeah.

18 BY MS. ELSON:

19 Q. Are you aware that the state has admitted
20 that it hasn't taken any measures to address the
21 failings that Dr. Halderman identified?

22 MR. RUSSO: Objection to form.

23 THE WITNESS: I don't know what the
24 failings are that Dr. Halderman has identified.

25

1 UNCERTIFIED ROUGH DRAFT SARA TINDALL GHAZAL 11052154
1 BY MS. ELSON:

2 Q. Does the knowledge that a computer expert
3 has identified failings in Georgia's voting
4 equipment affect your confidence in Georgia's
5 current system?

6 A. Again, going back to how we started, I'm
7 not aware of any computer-based system that does not
8 have vulnerabilities.

9 Q. So your answer would be that the findings
10 of Dr. Halderman, that the currently used equipment
11 can be hacked in a variety of ways doesn't affect
12 your confidence in that equipment?

13 MR. RUSSO: Objection to form. She
14 doesn't know what the findings are or the
15 opinion, I should say.

16 THE WITNESS: Without understanding the --
17 the -- the -- the findings, I -- it -- it can't
18 affect my confidence in the system.

19 BY MS. ELSON:

20 Q. Has the state election board ever had a
21 cyber security expert examine the BMD election
22 system?

23 MR. RUSSO: Objection to form.

24 Are you asking about since she's been on
25 the state election board?